

# NOTICE OF OPERATION – DRILLING WORKS

# Heytesbury Underground Gas Storage (HUGS) Project

This Notice of Operation Plan ('Notice') provides an overview of the proposed Heytesbury Underground Gas Storage (HUGS) Project drilling phase. The purpose of this Notice is to provide information on the drilling works phase of the project to our project stakeholders. The information included is as required by sections 161 and 163 of the Petroleum Act 1998 ('Act') and section 23, 24, 25, 26 and 27 of the Petroleum Regulations 2021 ('Regulations').



# WHAT IS AN OPERATION PLAN?

An Operation Plan ('Plan') is a document required under the Act in relation to a proposed petroleum operation. A Plan must be approved by regulators before work can commence. The Plan:

- identifies risks and impacts to the environment, any member of the public and to land or property in the vicinity of the operation;
- identifies risks to any petroleum, source of petroleum or reservoir in the vicinity of the operation;
- outlines what the holder of the authority (Lochard Energy) will do to eliminate or minimise those risks and impacts;
- specifies what the holder of the authority will do to rehabilitate affected land; and
- sets out any other matters required by the Regulations.

# **Authority Holder Details:**

Lochard Energy (Iona Operations) Pty Ltd Level 10, 2 Southbank Boulevard, Victoria 3006.

For more information contact Susie Bartlett. **By phone:** 1800 848 879 **By email:** hugs.project@lochardenergy.com.au **Or website:** <u>www.lochardenergy.com.au</u>

The proposed MFCT wellsite will be located within the boundaries of Petroleum Production Licence Number 4 ('PPL4'). The temporary group accommodation camp is located at the Tregony decommissioned wellsite within the boundaries of Petroleum Production Licence Number 7 ('PPL7').



# WHAT IS THE HUGS PROJECT?

Lochard Energy is the proponent of the Heytesbury Underground Gas Storage (HUGS) Project which includes the new Mylor, Fenton Creek and Tregony Wellsite (MFCT wellsite) and the HUGS Pipeline, which will expand the storage capacity of the Iona Gas Storage Facility (IGSF).

The HUGS Project will provide additional security of supply and reliability to the growing demands for energy storage in the eastern Australian energy market, which will help support the transition to a lower carbon future. Underground storage capacity of the IGSF will be increased through the development of the existing Heytesbury depleted gas fields. The Heytesbury depleted gas fields are all natural sandstone formations that have had pre-existing natural gas extracted and are therefore ideal as a natural geological formation for the gas storage.

The HUGS Project will develop a new single wellsite location which will be capable of accessing the three depleted gas fields Mylor, Fenton Creek, and Tregony (referred to as the MFCT wellsite). The current plan is to only develop the Mylor field with the drilling and installation of two new gas storage wells see Figure 1.

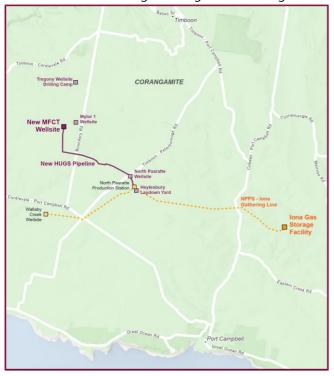


Figure 1 - HUGS MFCT Wellsite and Pipeline Overview

In order to connect the MFCT wellsite to the IGSF, a new pipeline is required. This proposed new 5.3km pipeline (the HUGS Pipeline) will transport gas and potentially hydrogen in the future or a blend of both, to and from the underground gas storage fields via the new MFCT wellsite.

The HUGS Pipeline will be an extension to Lochard Energy's existing pipeline network and will connect at the North Paaratte Production Station (NPPS).

The HUGS Project is currently in the planning stage and is subject to ongoing studies and approval, however, the proposed construction timeframe is for some works to start in 2024, with construction scheduled to be completed in 2026.

Lochard Energy employees from the IGSF and Melbourne head office will be directly involved in overseeing well development which has five (5) key stages:

- 1. Preparatory works (the subject of a previous Notice of Operation);
- Drilling and completion of the gas storage well(s) (the subject of this Notice of Operation);
- 3. Wellsite construction work;
- 4. Ongoing operation; and
- 5. Decommissioning and rehabilitation.

Lochard Energy are seeking regulatory approval for the second stage of the MFCT wellsite development, described in this Notice, which involves the drilling and completion of up to two gas storage wells, designated as Mylor-2 and Mylor-3. The HUGS Drilling Operation Plan will provide all details related to this stage.

# WHAT ARE THE DRILLING WORKS?

The previously prepared and subsequently approved operations plan was for preparatory works involving the establishment of fencing and gates, project offices, an access road, a drill pad/hardstand area and all associated ancillary storage and working areas which will be used for drilling activities. Stage 2 of the HUGS project and the subject of this Notice and Plan includes the following activities (Drilling works):

- Move in and rig up of drilling rig and accommodation camp;
- Drilling and evaluation of 2 well bores to a vertical depth of ±1800m to intersect the Mylor gas field;
  - Open hole testing including flaring will take place during evaluation of one well only during rig operations;
  - Wireline monitoring operations at the existing Mylor 1 location during above evaluation;



- Casing and cementing of the well bores;
- Well completions including 'Xmas tree' installation once drilling is completed;
- Drilling rig pull down and demobilisation from site;
- Post Rig demobilisation well clean-up / testing (flaring) on both wells, and;
- Site clean-up (well cuttings removal) post rig demobilisation (unless included in the next phase).

The temporary accommodation camp for external contractors will be established at the existing Tregony wellsite that was decommissioned in early 2024. The Tregony wellsite is located off Boundary Rd in Timboon, see Figure 5.

The drilling contractor and other third-party services forming the drilling team, are appropriately skilled and qualified. The number of people on site will vary with site activities, peak numbers expected onsite are approximately 50.

The MFCT wellsite is at 464 Boundary Road, Timboon West. Access is off East and West Road (see Figure 2). Lochard has establish a project area of 1.75ha, and includes provision for the space required for soil stockpiles, ancillary equipment laydown and portable offices to support the works as described in the HUGS Preparatory Works Operations Plan. The Heytesbury Laydown yard located adjacent to the NPPS on Gas Works Rd may also be utilised for additional equipment storage requirements. The third stage of MFCT wellsite development, wellsite construction, will continue to use this area as surface infrastructure is progressively installed. Once completed, the permanent project area will be reduced to approximately 1 ha (see Figure 3).



Figure 2 - MFCT Wellsite Location and Gas Field

Wellsite construction works post drilling will be completed under a different Plan and Notice. On completion the new operating MFCT wellsite will be securely fenced and all non-operational equipment removed from the wellsite.



Figure 3 - MCFT Wellsite Location and Dimensions

The green hashed area is a representation of the initial project area of 1.75ha as described previously. This extended project area will be covered under the HUGS Drilling Operations Plan, which includes rehabilitation requirements in line with the petroleum regulations. An early rehabilitation phase for the green hashed area will be required on completion of the project as the final site area will remain as the blue solid square with access denoted as the pink line.

# WHEN IS THIS PLANNED TO HAPPEN?

Dates for the Drilling works are expected to begin in Q2 2025, subject to obtaining relevant approvals, and are anticipated to take approximately 100 days in total. Rig Operations are planned to run for approximately 70 of those days, which will require 24 hours per day, 7 days per week operations.



# **HEALTH, SAFETY & ENVIRONMENTAL**

# **CONSIDERATIONS**

Lochard Energy is committed to supporting sustainable environmental practices and continually strives to ensure that it uses best practice approaches to health, safety and the environment at the Iona Gas Plant (IGP) and associated projects.

The IGP Safety Management System (SMS) and IGP Environment Management System (EMS) provide for the overarching management of health, safety and environment risks for the IGP and associated gas storage sites. The HUGS Project uses these systems and will be conducted in compliance with regulatory requirements and approvals.

An essential component of compliance is the identification of potential risks and impacts to the health and safety of personnel, contractors and the public, to land or property in the vicinity and to the environment (including potential effects on the local amenity).

To achieve this, Lochard has identified where the planned Drilling works and associated activities will (impacts) or might (risks) interact with vulnerable aspects of the surrounding environment. To understand this more, Lochard has commissioned studies to provide more information about specific features including cultural heritage, local ecology, subsurface studies and traffic management.

The HUGS Drilling Operation Plan will incorporate an environment management plan to outline management of environmental risks and impacts, including actions taken to reduce these so far as is reasonably practicable.

A HUGS Drilling Health, Safety, Environment Management Plan (HSEMP) outlining HSE management expectations and requirements on training, supervision, risk assessment and control, protective equipment and specific hazardous tasks will also be developed.

A summary of environmental and social impacts and potential risks are provided in Table 1 at the end of this document.

# **KEY CONSIDERATIONS FOR THE MFCT**

# WELLSITE DRILLING WORKS

#### Noise

Drilling works are expected to introduce a level of additional noise to the surrounding environment, sourced mainly from the drilling rig and other heavy plant and equipment used for drilling activities. This is expected to occur during both day and night hours for a portion of the overall Drilling works timeframe. It is expected there will be a small amount of flaring of gas which is required as part drilling to assist with reservoir evaluation and during the well clean-up phase prior to construction operations commencing.

Background noise levels of the surrounding environment have been obtained prior to the site preparatory works commencing. With this information and the expected noise emissions from the equipment to be used during drilling, Lochard Energy can better understand expected noise levels at receptor sites and the most effective means to reduce noise emissions at these locations so far as reasonably practicable.

Ongoing noise monitoring activities will be undertaken during drilling works which Lochard Energy will respond to if unexpected levels are detected.

Lochard Energy acknowledges the effects on amenity for neighbouring residents and the potential disturbance of livestock. Lochard will keep in touch with landowners as works progress and will continue to work with landowners to minimise disruption. Community members are encouraged to contact Lochard with any queries.

#### Groundwater

Drilling down to the Mylor field will require drilling through several aquitards (sealing layers) and aquifers as shown in Figure 4. The Port Campbell Limestone and Dilwyn Formation are important aquifers in the region, providing water for farmers and the domestic water supply for several towns. The deeper formations of the Pebble Point, Paaratte and Nullawarre Greensand are saline and not beneficial use aquifers at this location. The Waarre Formation, which contains the Mylor reservoir, is deeper at depths of 1,000 to 2,000 metres across the region.



The Mylor reservoir is at approximately 1,620-1,770 true vertical metres below surface which is  $\pm 900-950$  vertical metres below the Dilwyn aquifer and separated by three aquitards.

Lochard Energy's drilling practices are designed to protect all aquifers and isolate them from one another. Drilling fluids are designed to minimise losses and damage to drilled formations. Biodegradable and environmentally friendly additives have been selected where possible. Steel casing lines the wellbore and is cemented in place from the bottom of the well to surface. Casing and cement are pressure tested and electronically logged to ensure a lasting robust seal across all different underground formations. This technique has been used for the existing gas wells on site and will be used for the HUGS Project. Monitoring is ongoing once the well is established. Pressure and other testing is conducted on an ongoing basis to ensure integrity of the well is maintained.

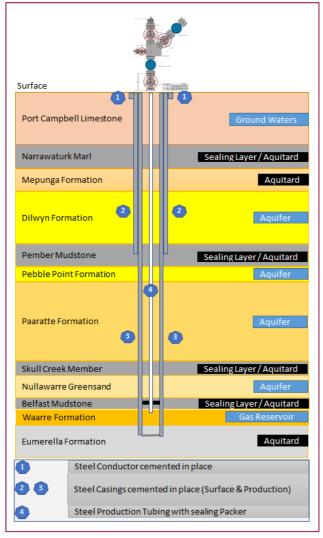


Figure 4 – Mylor Well Formation Layers

#### Traffic

Drilling works will involve movement and use of specialised contractors and a number of service providers to and from the project site, requiring a number of personnel and some heavy vehicle movements.

It is expected key materials and equipment will be delivered to the site via East and West Road, off Boundary Road, Timboon West. It is not planned to use the western access to East and West Road off Timboon-Curdievale Road.

To minimise the risk of incidents involving transport and public vehicles, these activities will be conducted in accordance with VicRoads requirements. Lochard's IGP Traffic Management Plan and Drilling Traffic Management Plan prioritise public safety and minimising disruption to the local community. All existing local traffic curfews will be adhered to for the Drilling works.

There will be some increase in traffic movement in the localised area for the duration of the Drilling works, however the overall traffic burden on East and West Road will remain low. The location of the project accommodation camp means that the majority of traffic is contained between the Tregony wellsite and the MFCT wellsite on Boundary Rd, further mitigating the traffic movement risk, see Figure 5.



Figure 5 - MFCT Wellsite and temporary Group Accommodation Camp Location at the Tregony decommissioned wellsite



#### Land and surface waters

There are no waterways within the wellsite area (the closest is Mosquito Creek which is approximately 500 metres west of the wellsite) hence the risk to surface waters from drilling activities is low. As noted in Table 1 there is a localised risk to land at the wellsite through spills and erosion.

The transport and storage of fuel and hazardous chemicals are controlled activities and will be conducted in accordance with Lochard procedures to reduce the potential of an incident releasing materials into the environment.

All equipment, fuel and chemicals will be stored in suitable bunded containers and will be removed at the end of Drilling works. Erosion and sediment controls will be installed such as silt fencing, diversion of stormwater run-off and sediment traps or basins.

Spill kits compatible with the material being stored and handled will be available during drilling operations. Personnel are trained to respond in the event a spill or leak occurs. All releases are recorded by Lochard and reported to the regulator as required.

Rehabilitation of part of the project area will be completed after the well construction stage (following completion of drilling). A tailored rehabilitation plan will be developed in consultation with the landowner incorporating landowner requirements. Subsoil and topsoil will be separated to facilitate effective rehabilitation. Re-seeding of rehabilitated areas will occur at the most appropriate time of the year in consultation with the landowner and per specialist consultant advice.

#### **Greenhouse Gas (GHG) Emissions**

Lochard Energy has estimated scope 1 and 2 greenhouse gas emissions for the life of the HUGS Project including each stage through to decommissioning and rehabilitation, and they are considered minimal when compared to the current total Victorian emissions and to the benefit provided to Victoria to help smooth the transition away from coal. Overall, assuming an operational life of 25 years, total emissions have been estimated at 0.026% of the Victorian emissions budget 2027 -2052. For the Drilling works, sources of GHG emissions include well testing, venting and flaring, fugitive emissions, use of diesel equipment and transportation activities. Lochard Energy will work to minimise emissions from these sources through actions such as keeping flaring operations to a minimum, inspection and maintenance of vehicles, plant and equipment to maintain optimal operation, switching off diesel-powered equipment when not in use or not required and communication of this requirement through personnel training and induction processes.

# **TRADITIONAL OWNERS**

Lochard Energy acknowledges the Eastern Maar people as the Traditional Owners of the land on which the MFCT wellsite is located. The Eastern Maar are the Registered Aboriginal Party and Native Title holders for the southwest Victoria region. Lochard Energy has had continuous engagement and consultation with the Eastern Maar for this project and has an approved Cultural Heritage Management Plan (CHMP). This CHMP is currently being updated to amend the Activity Area to include additional areas, including the temporary group accommodation camp site.

# **COMMUNITY INVESTMENT**

Project benefits are expected to include provision of additional income streams to the Western Victorian region via the use of accommodation, food outlets, conference facilities, personnel hire and local services.

Lochard Energy supports the ongoing employment of local people at the IGP (more than 50 people are directly employed and live in the region) and local businesses providing services including water, labour, catering, fencing, rubbish removal, security, cleaning and flora and fauna experts.

# **KEEPING YOU INFORMED**

Lochard Energy has developed a HUGS Project Stakeholder Engagement Plan to identify and engage with project stakeholders to ensure those affected by the Project are kept informed on project progress or otherwise consulted.

# **KEEPING IN TOUCH**

Lochard Energy will continue to engage with local landowners, community members, councillors, and government officials and is committed to keeping stakeholders informed of project activities and answering your questions.

The Iona Community Liaison Committee (CLC) meetings are the primary interface with community members and updates on works have been and will continue to be provided at this forum.

Notifications will be provided to neighbours in advance of the works commencing.

#### For general project inquires, updates or to speak with the project team:

Project Team Representative: Susie Bartlett

By phone: 1800 848 879

By email: Hugs.Project@lochardenergy.com.au

Or website: www.lochardenergy.com.au

The HUGS Project Stakeholder Engagement Plan aims to both inform and consult with stakeholders over the life of the project and ongoing operations. Please get in touch with the HUGS Project team as shown below should you require more information.

# HOW TO GET IN TOUCH WITH LOCHARD ENERGY

Lochard Energy will commence considering submission on Monday 7 October 2024. Submissions concerning this Notice must be made in writing to Lochard Energy by **Monday 28 October 2024.** 

Submissions will be reviewed, considered and replied to in the preparation of the HUGS Drilling Operation Plan.

Please address your submission to:

By mail:

HUGS Drilling Operation Plan Submission Attention: Susie Bartlett Iona Gas Plant, 285 Waarre Road, Port Campbell, VIC, 3269

By email: <u>Hugs.Project@lochardenergy.com.au</u>



# HUGS PROJECT | NOTICE OF OPERATION | DRILLING WORKS

# Table 1 - Summary of Impacts and Potential Risks

Potential Risk/Impact	Sources	Lochard Energy Actions/Mitigation Steps
Noise – disturbance to residents and livestock	Drilling activities and flaring. Vehicles and equipment. Accommodation camp activities.	Site selection for drilling considered maintaining a buffer distance to the nearest resident (>500 metres away). Activities such as testing and flaring scheduled for completion during daylight hours where possible. Landowner notification ahead of high noise activities, allowing for relocation of livestock if necessary. Noise awareness for personnel through training, inductions and pre-work meetings. A Camp Management Plan outlines expectations and requirements for management of noise. Further details have been provided in the "Key considerations" section above.
Light – disturbance to residents and livestock	Off-site light emissions from drill rig lighting and portable lighting used on site, and accommodation camp lighting.	Light during night drilling operations is required to ensure a safe workspace for the drilling teams. Actions such as orientating portable lights, limiting driving to daylight hours where possible (excluding shift changeover) and conducting flaring in daylight hours. Inductions to include management of light to minimise impact to adjacent landowners as much as possible. Landowner notification ahead of work commencing to allow for arrangements around minimising adverse impacts on livestock. A Camp Management Plan covers light requirements at the Tregony camp location.
Traffic and infrastructure - reduction in visual amenity	Temporary equipment/facilities required for drilling works	The wellsite's are accessible via East and West Road which is used by limited local traffic. Tree lines will provide some screening however the drilling rig will be visible at night. Infrastructure, vehicles and equipment are to be removed from site when no longer needed. Community and landowners to be kept informed on project dates, activities etc
Impedance of existing land use	Project footprint required to accommodate equipment and facilities.	Established agreements with the landowner on details such as access, site infrastructure and rehabilitation requirements. Fencing off the project area from the remainder of the property with a dedicated access track to delineate project activity as agreed with landholder. Site footprint minimised for drilling and will be further reduced once wellsite construction is finished. Project inductions and pre-start meetings inform personnel of requirement to stay within boundaries.
Local community disruption	Increased traffic and heavy vehicle movements. Increased number of people using local services.	<ul> <li>HUGS Drilling Traffic Management Plan prescribes route/speed limits to minimise community disruption.</li> <li>Advising local communities of increased traffic movements ahead of rig mobilisation.</li> <li>All existing local traffic curfews will be adhered to.</li> <li>Further details have been provided in the "Key considerations" section above.</li> </ul>



Potential Risk/Impact	Sources	Lochard Energy Actions/Mitigation Steps
Contribution to GHG emissions.	Equipment/plant and vehicles used for drilling activities. Venting/flaring during testing and well clean-up activities.	Emissions for each component of the HUGS Project have been estimated and will be tracked and reported on in accordance with regulatory requirements. Actions to reduce the level of emissions include minimising venting/flaring, maintenance of plant and equipment for optimal operation and switching off diesel powered equipment when not in use. Further details have been provided in the "Key considerations" section above.
Groundwater contamination caused by drilling operations.	Requirement to drill through subsurface formations. Incidents involving drilling activities such as loss of well control. Use of drilling fluid as part of the drilling process.	<ul> <li>Best practice drilling techniques are implemented by Lochard Energy, designed to protect all of the aquifers and isolate them from one another.</li> <li>Techniques include step-by-step establishment and verification of barriers which isolate the wellbore from the surrounding formation/aquifers.</li> <li>Some minor infiltration of drilling fluid or mud filtrate into the zone directly surrounding formation is possible, however fluids and practices are designed to minimise this.</li> <li>Further details have been provided in the "Key considerations" section above.</li> </ul>
Generation of wastes which require off-site disposal.	General waste from the site offices and accommodation camp. Operational waste such as drill cuttings and fluids, excess cement and Regulated Wastes.	All wastes will be disposed of in accordance with EPA Victoria requirements. Lochard Energy will actively look for opportunities to reduce the volume of waste requiring disposal through minimising waste generation where possible, or recycling of materials. A dedicated Waste Management Plan will establish and outline waste management requirements.
Introduction and/or dispersion of noxious weeds or pathogens	Vehicles / equipment brought to site. Site works and ground disturbance. Importation of materials.	Vehicles and equipment are to be clean prior to arrival on-site. Fencing of wellsite area and access track boundary to ensure vehicles remain within required areas. Lochard Energy will work with the landowner before commencing work to ensure any changes to biosecurity are understood and implemented and that timing of weed management activities minimise disruption. Use of information from a baseline weed assessment to gauge whether further weed management is required. Lochard Energy subscribes to government media alerts in the event of outbreaks (e.g., foot and mouth disease)
Dust emissions	Vehicle and equipment activity. Soil stockpiles. General site work.	<ul> <li>Project area construction method reduces the likelihood of dust generation.</li> <li>Cover stockpiles if necessary during storage periods to prevent dust generation.</li> <li>Dust suppression using a water tanker for roadways and water spray over disturbed areas/stockpiles where necessary.</li> <li>Vehicle/Equipment movements to be kept to approved work areas and in accordance with HUGS Drilling Traffic Management Plan requirements.</li> <li>Monitoring during high wind events and responding to visible dust movement beyond the project area.</li> </ul>



Potential Risk/Impact	Sources	Lochard Energy Actions/Mitigation Steps
Vehicle/road traffic incident	Heavy vehicle/equipment movements. Local traffic between the project accommodation and wellsite.	Activities will be conducted in line with the National Heavy Vehicle Regulator, VicRoads requirements, IGP Traffic Management Plan and the HUGS Drilling Traffic Management Plan which establishes traffic curfews and routes. Lochard Energy will advise regional and local residents of traffic movements ahead of the works commencing. Speed reduction to 60 km/hr on East and West Road is proposed (subject to council approvals).
Uncontrolled release of fuels, chemicals or wastes during transportation	Transportation of Dangerous Goods, hazardous materials required for drilling. Transportation of drilling wastes.	Lochard Energy will use licensed transporters including waste contractors licensed and approved by EPA Victoria and ensure compliance with applicable transport regulations. Wastes are tracked from leaving the site through to disposal. Lochard Energy uses experienced suppliers of Dangerous Goods and hazardous materials transport services.
Land and surface water contamination	Surface spills from fuel/chemical storage areas. Accidental release of waste	<ul> <li>Storage of materials will comply with Lochard Energy standards and requirements.</li> <li>Temporary storage at the project sites will be within bunded areas and double-skinned tanks used for fuel, with quantities to be kept to a minimum.</li> <li>Spill kits will be kept on site and immediate clean ups will be initiated if a spill or leak occurs.</li> <li>All waste captured onsite in designated appropriate bins and disposed of in accordance with EPA requirements.</li> <li>Disposal of general and recyclable waste will be through dedicated waste/recycling bins.</li> <li>Regular inspection of all waste storage bins/locations to check status.</li> <li>Further details have been provided in the "Key considerations" section above.</li> </ul>
Ground water contamination	Incident involving drilling activities such as loss of well control. Well integrity issues.	<ul> <li>Drilling is conducted by specialised, qualified and experience drilling contractors.</li> <li>Well design isolates the wellbore from the surrounding environment. The well equipment is verified to ensure an effective seal.</li> <li>Ongoing periodic maintenance and monitoring of well integrity through pressure monitoring, maintenance, inspection is established once each well is operational.</li> <li>Further details have been provided in the "Key considerations" section above.</li> </ul>
Erosion and/or sediment run-off	Stockpiles of subsurface clays and topsoil.	Erosion/sediment controls such as silt fencing, drains and sediment traps. Periodic inspection and maintenance to check effectiveness. Covering of stockpiles if necessary. Planned stockpile areas for most appropriate locations (eg. away from drainage lines).
Impact on flora and fauna	Area required for drilling works and site access.	Drilling works will be contained in a fenced area within previously disturbed areas – works do not require removal of native vegetation. Desktop and site ecology assessment completed to assess the biodiversity values of the site and inform control measures to minimise impact.



Potential Risk/Impact	Sources	Lochard Energy Actions/Mitigation Steps
		The site design has been developed to avoid protected trees and to define protected tree zone areas. There are no plans to remove any native vegetation as part of the drilling works.
Disturbance of aboriginal and non- aboriginal cultural heritage sites	Drilling activities.	<ul> <li>No areas of Aboriginal Cultural Heritage sensitivity or of non-aboriginal heritage are located within the project area, however, the wellsite is included in the Cultural Heritage Management Plan (CHMP) developed for the HUGS Project.</li> <li>The CHMP is currently going through the process of amendment to include additional areas for ancillary infrastructure due to an expanded area being required for construction works during the next phase of the project at the Iona Gas Plant, NP-4/5 Wellsite, NPPS, Tregony Wellsite, existing Mylor Wellsite, and Beach Energy's Heytesbury Site</li> <li>The CHMP provides guidance on requirements and actions in the event that items are discovered.</li> <li>Drilling works and the camp location will be contained in a fenced area within previously disturbed areas.</li> </ul>
Emergencies	Uncontrolled release of gas due to loss of well control. Site activities or incidents cause bush/grassfire impacting on adjacent properties. External emergencies such as an off-site bushfire.	<ul> <li>Well control equipment installed and periodically tested.</li> <li>Well control procedures, training and drills.</li> <li>Monitoring programs.</li> <li>A dedicated HUGS Drilling Emergency Response Plan identifies emergency scenarios and provides instructions for effective and efficient response to reduce impacts as much as possible.</li> <li>Control of work including ignition controls is done via a permit to work process. Lochard Energy will comply with restrictions such as when Total Fire Bans are in place.</li> <li>On-site firefighting and first aid response equipment will be in place, with trained personnel.</li> <li>Wellsite is within a cleared area with limited flammable materials.</li> </ul>